

**REMARKS**

Claims 1-8 and 13-22 are pending in this application. By this Amendment, the specification and claims 1 and 3-4 are amended, claims 9-12 are canceled and new claims 13-22 are added. Various amendments are made for clarity and are unrelated to issues of patentability.

Each of Figs. 1-4 is labeled as "Related Art." Therefore, in order to avoid any confusion, the specification is amended at various places so as to coincide with the related art labels of Figs. 1-4. No new matter is added as these amendments are merely to clarify the labeling of Figs. 1-4.

The Office Action rejects claims 1-8 under 35 U.S.C. §102(a) by Applicant's Admitted Prior Art, pages 1-8, Figs. 1-4 (hereafter AAPA). The rejection is respectfully traversed with respect to the pending claims.

The Office Action rejects the pending claims based on AAPA. However, it is unclear how Figs. 1-4 are prior art since Figs. 1-4 are not labeled or discussed as being prior art. The originally filed application clearly labels Figs. 1-4 as related art. However, "related art" does not mean that the figures constitute prior art. Furthermore, the specification does not identify Figs. 1-4 as prior art. The Office Action does not explain how figures labeled as related art constitute prior art under 35 U.S.C. §102. The rejection should be withdrawn since the Office Action has not shown prior art that satisfies 35 U.S.C. §102.

Independent claim 1 recites a multi-chip module in which at least one control chip having a control circuit for controlling the PDP, and at least one memory are mounted on a single

package, wherein the multi-chip module is mounted on a printed circuit board (PCB) of a control board.

The Office Action identifies a timing controller 32 (such as in Fig. 3) as corresponding to the claimed multi-chip module and the claimed single package. However, a timing controller 32 is not a multi-chip module and/or a single package having a control chip and a memory as appears to be alleged in the Office Action. Paragraph [0025] of the present specification clearly describes that each of the plurality of frame memories 33 located around the system control chips (ex. ASIC) are mounted on the PCB of the control board in the form of an individual package. In other words, each frame memory is in an individual package. Accordingly, the timing controller 32 does not teach or suggest the multi-chip module in which at least one control chip and at least one memory are mounted on a single package as recited in independent claim 1.

Furthermore, the timing controller 32 does not teach or suggest the multi-chip module in which the at least one control chip and at least one memory are mounted on a single package as recited in independent claim 4. Still further, the timing controller 32 does not teach or suggest the multi-chip module including a plurality of control chips and a plurality of memories on a package as recited in independent claim 13. AAPA clearly does not suggest the plurality of control chips and plurality of memories on a package. Rather, paragraph [0025] teaches that each frame memory is in an individual package.

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For at least the reasons set forth above, AAPA does not teach or suggest all the features of each of independent claims 1, 4 and 13. Thus, independent claims 1, 4 and 13 define patentable subject matter.

Each of the dependent claims depends from one of the independent claims and therefore defines patentable subject matter at least for this reason. In addition, the dependent claims recite features that further and independently distinguish over the applied references.

For example, claims 19 and 21 recite a plurality of control chips mounted on the single package. Further, claims 20 and 22 recite a plurality of memories mounted on the single package. AAPA does not teach or suggest these features. Thus, dependent claims 19-22 define patentable subject matter at least for these additional reasons.

### **CONCLUSION**

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance. Favorable consideration and prompt allowance of claims 1-8 and 13-22 are earnestly solicited. If the Examiner believes that any additional changes would place the application in better condition for allowance, the Examiner is invited to contact the undersigned attorney at the telephone number listed below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this,

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concurrent and future replies, including extension of time fees, to Deposit Account 16-0607 and please credit any excess fees to such deposit account.

Respectfully submitted,



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